

## **EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  BAYOU STEEL BD HOLDINGS, LLC, <i>et al.</i> ,  Debtors.	Chapter 7  Case No. 19-12153 (KBO)  (Jointly Administered)
GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of BAYOU STEEL BD HOLDINGS, L.L.C., <i>et al.</i> ,  Plaintiff,  vs.  M.A.R.S., INC. dba MODERN AMERICAN RECYCLING SERVICES,  Defendant.	Adv. Proc. No. 21-50215 (KBO)  <b>Ref. Adv. Docket Nos. 4 and ____</b>

**ORDER APPROVING SECOND STIPULATION FOR FURTHER EXTENSION OF  
TIME FOR THE DEFENDANT TO ANSWER, MOVE OR OTHERWISE  
RESPOND TO THE COMPLAINT**

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Upon consideration of the *Second Stipulation for Further Extension of Time for the Defendant to Answer, Move or Otherwise Respond to the Complaint* (the “Stipulation”) filed by the Chapter 7 Trustee and the Defendant; and the Court having reviewed the Stipulation, a copy of which is attached hereto as **Exhibit 1**; and good cause appearing for the relief requested therein, it is hereby ORDERED THAT:

1. The Stipulation, attached hereto as **Exhibit 1**, is approved in its entirety.
2. This Court retains jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

## **EXHIBIT 1 TO ORDER**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BAYOU STEEL BD HOLDINGS, LLC, *et al.*,<sup>1</sup>

Debtors.

GEORGE L. MILLER, in his capacity as Chapter 7  
Trustee of BAYOU STEEL BD HOLDINGS, L.L.C.,  
*et al.*,

Plaintiff,

vs.

M.A.R.S., INC. dba MODERN AMERICAN  
RECYCLING SERVICES,

Defendant.

Chapter 7

Case No. 19-12153 (KBO)

(Jointly Administered)

Adv. Proc. No. 21-50215 (KBO)

**SECOND STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO  
ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

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Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Bayou Steel BD Holdings, L.L.C., *et al.*, (the “**Plaintiff**”), for the estates of the above-captioned debtors (the “**Debtors**”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “**Bankruptcy Code**”), by and through his undersigned counsel and defendant M.A.R.S., Inc. dba Modern American Recycling Services (the “**Defendant**,” and together with Plaintiff, the “**Parties**”), enter into this *Second Stipulation for Extension of Time for Defendant to Answer, Move or Otherwise Respond to the Complaint* (the “**Stipulation**”) and hereby stipulate and agree as follows:

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

1. The Parties agree and stipulate that the time within which the Defendant may answer, move, or otherwise plead in response to the *Complaint* [D.I. 1] in the above-captioned adversary proceeding is hereby extended to and including May 28, 2021.

2. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved.

Dated: April 29, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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